

STAFF ANALYSIS
EMERGENCY SPECIAL ACTION
WSA15-01

ISSUES

Emergency Special Action WSA15-01, submitted by the Alaska Peninsula/Becharof National Wildlife Refuge, requests that a Federal registration permit be required to hunt moose in Unit 9C – that portion draining into the Naknek River from the south, during the Aug. 20 – Sept. 20 season. A Federal registration permit is already required for the Dec. 1 – Dec. 31 season.

DISCUSSION

The Unit 9C Federal fall moose hunt season starts 12 days before the State season and continues 5 days beyond the State season as well. This hunt is only open on Federal public lands of Unit 9C within the Becharof National Wildlife Refuge (NWR). A State registration permit is required for the fall portion of the Federal hunt; however, Federally qualified subsistence users in Unit 9C are currently hunting with a permit whose dates differ from that of the Federal season. The proponent is concerned that this causes confusion and conflict between the State and Federally qualified subsistence users due to the issuance of permits prior to the start of the State season. The proponent states that requiring a Federal registration permit would alleviate concerns and reduce confusion by simplifying requirements for the entirety of the Federal season.

Further discussions with both State and Federal managers indicated that although the requested Special Action would be a change from the recommendations made by the Unit 9 moose working group, both parties felt that having a Federal registration permit for Unit 9C would be preferable from a law enforcement and reporting standpoint, even if it may be less convenient for some hunters.

The applicable Federal regulations are found in 50 CFR 100.19(a) (Special Actions) and state that:

“...In an emergency situation, if necessary to ensure the continued viability of a fish or wildlife population, to continue subsistence uses of fish or wildlife, or for public safety reasons, the Board may immediately open or close public lands for the taking of fish and wildlife for subsistence uses, or modify the requirements for take for subsistence uses, or close public lands to take for nonsubsistence uses of fish and wildlife, or restrict the requirements for take for nonsubsistence uses.”

Existing Federal Regulation

Unit 9C—Moose

Unit 9C – that portion draining into the Naknek River from the south – 1 Aug. 20 – Sept. 20 bull. A State registration permit is required during the Aug. 20 – Sept. 20 season; a Federal registration permit is required during the Dec. 1 –31 season.

Dec. 1 – Dec. 31

Public lands are closed during December for the hunting of moose, except by Federally qualified subsistence users hunting under these regulations.

Proposed Federal Regulation

Unit 9C—Moose

*Unit 9C – that portion draining into the Naknek River from the south – 1 Aug. 20 – Sept. 20 bull by **Federal registration permit**. ~~A State registration permit is required during the Aug. 20 – Sept. 20 season; a Federal registration permit is required during the Dec. 1 –31 season.~~*

Dec. 1 – Dec. 31

Public lands are closed during December for the hunting of moose, except by Federally qualified subsistence users hunting under these regulations.

Existing State Regulation

Unit 9C – that portion draining into the Naknek River

Residents: one bull by permit RM272 Sept. 1 – Sept. 15
in person in King Salmon
beginning Aug. 14

Residents: one antlered RM272 Dec. 1 – Dec. 31
bull by permit in person in
King Salmon beginning Nov.

*Nonresidents: one bull with RM282 Sept. 5 – Sept. 15
50-inch antlers or antlers
with 3 or more brow tines on
at least one side by permit in
person in King Salmon
beginning Aug. 14*

Extent of Federal Public Lands

Federal public lands comprise approximately 84% of Unit 9C and consist of Katmai National Park (70%), Katmai National Preserve (8%), Becharof National Wildlife Refuge (3%), Bureau of Land Management (3%), and Alagnak Wild River (<1%). The Katmai National Park manages the Alagnak Wild River and subsistence hunting is not authorized in Katmai National Park (**Map 1**).

Customary and Traditional Use Determinations

Residents of Units 9A, 9B, 9C, and 9E have a customary and traditional use determination for moose in Units 9A, 9B, 9C, and 9E.

Regulatory History

In 2008, Proposals WP08-30 and WP08-31, addressing moose in Units 9B and 9C, were submitted to the Federal Subsistence Board (Board) by the Bristol Bay Subsistence Regional Advisory Council (Council). Proposal WP08-30 requested a shorter moose season in Unit 9B while WP08-31 requested a closure of Federal public lands to non-Federally qualified users in Units 9B and 9C. Both proposals were related as the Council's support of WP08-30 was contingent on adoption of WP08-31. After extensive discussion and input from the State of Alaska and the Council Chair, the proposals were deferred by the Board so a working group could be formed to identify other management options that would address conflicts in the subunits of Unit 9.

Based on the direction given by the Board, the Office of Subsistence Management provided funding for and worked in cooperation with the Alaska Department of Fish and Game (ADF&G) to initiate a Unit 9 moose working group. The working group was established to better understand the conflicts in the region and to develop management strategies and recommendations for Unit 9 moose. The Council submitted a number of proposals (WP 10-47, 48, 49, 50, 52) to address user conflicts in Unit 9. In May 2010 the Board considered those proposals as well as proposals WP10-45 (deferred WP08-30) and WP10-46 (deferred WP08-31). The Board deferred all of these proposals, consistent with the recommendations of the Council until the Unit 9 working group could finish its work.

The working group discussed a number of management strategies and came to consensus on three recommendations:

- Submit proposals to the Alaska Board of Game and the Federal Subsistence Board to create a registration permit for all of the moose hunts in Unit 9.

- Conduct educational outreach directed at local moose hunters; and
- Offer educational trapping seminars in the Unit 9 villages.

To address the need for more data and better exchange of information between locals and the ADF&G, the working group proposed creating a registration permit hunt for moose throughout Unit 9. The requirements of this hunt would increase information available to wildlife managers about the moose hunt through hunt report cards. In addition, such a hunt would increase exchange of information between biologists and moose hunters during the permit distribution process. This hunt would also allow managers to redistribute hunting pressure to help eliminate user conflict.

In March 2011, the Board of Game considered and adopted Proposal 14, which was submitted by the Unit 9 working group. The proposal requested the establishment of registrations permit hunts for moose in Unit 9. At this meeting the Board of Game also adopted Proposal 17 which extended the moose hunting season five days in subunits 9C and 9E. Based on the actions of the Board of Game, the Council supported aligning, to the maximum extent possible, Federal regulations for moose hunting in Unit 9 with the changes made in State regulation (BBSRAC 2011).

In 2012, deferred Proposals WP10-45, 46, 47, 48, 50 and 52 were submitted to the Board by the Council. WP10-45 requested a change to the moose season dates in a portion of Unit 9. Proposals WP10-46, WP10-49 and WP10-50 requested that portions of Unit 9 be closed for the taking of moose by non-Federally qualified subsistence users. Proposals WP10-47, WP10-48 and WP10-52 requested that non-Federally qualified users hunting moose in portions of Unit 9 be restricted from harvesting moose within a two mile wide buffer on either side of waterways within Federal public lands. All of the proposals were originally deferred by the Board during its May 2010 meeting pending the outcome of the Unit 9 Moose Working Group process. The Board rejected Proposals WP10-46, 47, 48, 49, 50 and 52 and adopted Proposal WP10-45 with modification to require a State registration permit to harvest moose in Unit 9 and to add an additional 5 days to the fall seasons in Units 9C and 9E.

Biological Background

Since the early 20th century, moose on the Alaska Peninsula gradually expanded their range southwestward. This expansion was accompanied by a dramatic population increase until the 1960s, when the population peaked and then began to decline. Biologists believe that range damage from over-browsing lead to the decline (Butler 2010). Even after a series of hunting restrictions and improvements in range conditions, the moose population in some subunits, such as Unit 9E, had declined as much as 60% from the peak moose population in the 1960s. Brown bear predation on neonatal moose was thought to be the primary limiting factor of moose in Unit 9 (Butler 2010).

The State population objectives for moose in Unit 9 are to: 1) maintain existing densities in areas with moderate (0.5–1.5 moose/square mile) or high (1.5–2.5 moose/square mile) densities; 2) increase low-density populations (where habitat conditions are not limiting) to 0.5 moose/square mile; and 3) maintain sex ratios of at least 25 bulls:100 cows in medium-to-high density populations and at least 40 bulls:100 cows in low-density areas (Butler 2004 and 2008). Overall, management objectives for bull:cow ratios and population are being maintained in Units 9B (low density area), 9C (moderate density area) and

9E (moderate density area) (Butler 2009, pers. comm.). The bull:cow ratio has been above the management objective in Unit 9C and is increasing while calf:cow ratios remain within the normal range of variation observed over the last 25 years (Butler 2010). The current moose populations in Unit 9 are considered stable albeit at low density, with the current population estimate for Unit 9C outside of Katmai National Park at approximately 800 moose (Butler 2010).

In the past decade, local residents have regularly expressed difficulty in harvesting sufficient moose; a situation they attribute to a decreasing moose population. The erratic calf:cow ratios within Unit 9 (Butler 2008) may have led to the perception that the population is declining. Between 1998 to 2007, the calf:cow ratios in Unit 9B ranged as low as 2 calves:100 cows in 1999 to as high as 26 calves:100 cows in 2003 (Butler 2006 and 2008). In Unit 9C, the ratio was as low as 5 calves: 100 cows in 2003 and as high as 20 calves:100 cows in 2007 (Butler 2006 and 2008). The most recent composition surveys in 2013 showed an estimated calf:cow ratio of 25:100, and a bull:cow ratio of 38:100 in Unit 9 as a whole (Crowley 2014, pers. comm.).

Harvest History

Reported moose harvest (2003-2013) for Unit 9 can be found in **Table 1**. Local resident harvest (Alaskans that live in Unit 9) has ranged from 21 to 50 moose, nonlocal resident harvest (all other Alaskans) has ranged from 17 to 32 moose and nonresident harvest has ranged from 34 to 102 moose. The total reported moose harvest has ranged from 83 to 177 animals per year.

The majority of the reported moose harvest has occurred in September and aircraft continue to be the most common method of transportation with boats as the second most common transport mode (Butler 2010). Nonresidents typically had a higher success rate than residents as most flew out to hunt, and many employed guides (Butler 2010).

Effects of the Proposal

If this Special Action is adopted, it would require Federally qualified subsistence users to use a Federal registration permit for the fall moose season in Unit 9C - that portion draining into the Naknek River from the south while hunting on Federal public lands. This hunt is only open on Federal public lands of the Becharof National Wildlife Refuge. During the December season, Federally qualified subsistence users are already required to use a Federal registration permit to harvest moose in the affected area. The Federal permit requirement should reduce confusion for Federally qualified subsistence users by having a separate permit for the Federal hunt, which starts before and is longer than, the State season. This should result in better harvest reporting as many Federally qualified subsistence users are unsure of the reporting requirements while using a State permit during a Federal season. The moose population in Unit 9 appears to be stable, albeit at low densities. Changing to a Federal registration permit would have no effect on the moose population.

LITERATURE CITED

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